

EXHIBIT K

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THOMAS R. AHERN,

Plaintiff,

vs.

SIG SAUER, INC., AND CITY OF
CAMBRIDGE

Defendants.

Civil Action No.: 21-cv-11007-DJC

**DECLARATION OF COUNSEL IN SUPPORT OF PLAINTIFF THOMAS AHERN'S
OPPOSITION TO CITY OF CAMBRIDGE'S MOTION FOR SUMMARY JUDGMENT**

I, Michelle R. Pascucci, Esq., depose and say as follows:

1. I am a member of the firm of Donnelly, Conroy, & Gelhaar, LLP, attorneys for Plaintiff Thomas R. Ahern ("Mr. Ahern"), along with co-counsel Jeffrey Bagnell, Esq.
2. I submit this Affidavit based on personal knowledge in connection with, and in support of, Mr. Ahern's Opposition to the City of Cambridge's Motion for Summary Judgment ("Plaintiff's Opposition").
3. Attached as Exhibit A to Plaintiff's Opposition is a true and accurate copy of Mr. Ahern's Responses to Defendant SIG Sauer, Inc.'s Interrogatories.
4. Attached as Exhibit B to Plaintiff's Opposition is a true and accurate copy of select excerpts from the Deposition of Sergeant Joseph Murphy dated August 31, 2024.
5. Attached as Exhibit C to Plaintiff's Opposition, is a true and accurate copy of excerpts from Deposition of Deputy Leonard DiPietro dated October 12, 2023.
6. Attached as Exhibit D to Plaintiff's Opposition is a true and accurate copy of excerpts from Deposition of CPD Officer Hector Vicente dated October 19, 2023.

7. Attached as Exhibit E to Plaintiff's Opposition is a true and accurate copy of a complaint filed by Walter Collette, Jr. against SIG Sauer, Inc. and produced by SIG Sauer, Inc. at SIG-COMPLAINTS 00782-000820.

8. Attached as Exhibit F to Plaintiff's Opposition is a true and accurate copy of a Nov. 1, 2019 CPD Incident Report, filed under seal, and produced by the City of Cambridge at City Response Production 04 001706.

9. Attached as Exhibit G to Plaintiff's Opposition is a true and accurate copy of a Dec. 4, 2019 CPD Firearm Discharge Report, filed under seal, and produced by the City of Cambridge at City Response Production 3 001635.

10. Attached as Exhibit H to Plaintiff's Opposition is a true and accurate copy of email correspondence dated October 24, 2019, and produced by the City of Cambridge at City Response Production 4 003423.

11. Attached as Exhibit I to Plaintiff's Opposition is a true and accurate copy of email correspondence dated September. 30, 2019, and produced by the City of Cambridge at City Response Production 5 001582.

12. Attached as Exhibit J to Plaintiff's Opposition, to be filed under seal, is a true and accurate copy of email correspondence dated October 24, 2019, and produced by the City of Cambridge at City Response Production 5 001910.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 5, 2024 in Boston, Massachusetts.

/s/ Michelle R. Pascucci

Michelle R. Pascucci (BBO # 690889)

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